

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION

CLIFFORD MICHEL *et al.*,

*Plaintiffs,*

vs.

WORKRISE TECHNOLOGIES INC. *et al.*,

*Defendants.*

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Civil Action 1:21-cv-681

**MOTION TO WITHDRAW AND SUBSTITUTE COUNSEL**

Defendants Workrise Technologies Inc. and HCS Renewable Energy LLC (together, “Defendants”) file this Motion to Withdraw and Substitute Counsel (the “Motion”) and respectfully show the Court as follows:

**I. MOTION**

1. David R. Anderson and Rachel Z. Ullrich with the law firm of Ford Harrison, LLP previously appeared as counsel of record for Defendants in the above-referenced matter.

2. Alana K. Ackels, Jay M. Wallace, and Brent D. Hockaday with the law firm of Bell Nunnally & Martin, LLP have been retained and, on July 17, 2023, filed a notice of appearance in this case on behalf of Defendants.

3. Defendants now desire Ms. Ackels, Mr. Wallace, and Mr. Hockaday to substitute in place of Mr. Anderson, Ms. Ullrich, and the law firm of Ford Harrison, LLP

as their counsel in this matter. Defendants request the Court approve the withdrawal of Mr. Anderson, Ms. Ullrich, and Ford Harrison, LLP. Ms. Ackels, Mr. Wallace, and Mr. Hockaday will represent Defendants Workrise Technologies Inc. and HCS Renewable Energy LLC in this matter moving forward. This substitution of counsel is not sought for purposes of delay.

4. All further notices, correspondence, and pleadings should include notice to:

Alana K. Ackels  
State Bar No. 24066760  
aackels@bellnunnally.com  
Jay M. Wallace  
jwallace@bellnunnally.com  
State Bar No. 20769200  
Brent D. Hockaday  
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Bell Nunnally & Martin LLP  
2323 Ross Ave., Ste. 1900  
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214-740-1465 (Phone)  
214-740-5765 (Fax)

5. Defendants approve and consent to the substitution of Ms. Ackels, Mr. Wallace, and Mr. Hockaday as counsel of record for Defendants in this matter.

6. Plaintiffs oppose this Motion.

## II. CONCLUSION

Defendants respectfully request the Court enter an Order permitting Mr. Anderson, Ms. Ullrich, and Ford Harrison, LLP to withdraw as counsel in this matter, substituting Ms. Ackels, Mr. Wallace, and Mr. Hockaday with the firm of Bell Nunnally & Martin, LLP as counsel for Defendants Workrise Technologies Inc. and HCS Renewable Energy LLC. Defendants further request the Court grant Defendants such other relief to which they may be entitled at law or in equity.

Dated: July 25, 2023.

Respectfully submitted,  
**BELL NUNNALLY & MARTIN LLP**

By: /s/Alana K. Ackels  
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**COUNSEL FOR DEFENDANTS WORKRISE  
TECHNOLOGIES INC. AND  
HCS RENEWABLE ENERGY LLC**

**CERTIFICATE OF CONFERENCE**

The undersigned hereby certifies that she conferred with counsel for Plaintiff and Plaintiffs are opposed to this Motion.

/s/ Alana K. Ackels

Alana K. Ackels

**CERTIFICATE OF SERVICE**

I hereby certify that on July 25, 2023, a true and correct copy of the Notice of Appearance was served by and through CM/ECF on all known counsel of record in accordance with the Federal Rules of Civil Procedure.

/s/ Alana K. Ackels

Alana K. Ackels

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